

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.)
)
 INTERNATIONAL UNION, UNITED)
 AUTOMOBILE, AEROSPACE, AND)
 AGRICULTURAL IMPLEMENT)
 WORKERS OF AMERICA,)
)
 Defendant.)

Case No. 20-13293
Honorable David M. Lawson

ADDENDUM TO MONITOR'S SIXTH STATUS REPORT

Pursuant to Paragraph 58 of the Consent Decree (Dkt. No. 10), the Court-appointed Monitor, Neil M. Barofsky, respectfully submits to the Court this addendum to the Monitor's Sixth Status Report ("Sixth Report Addendum" or "Addendum") concerning the monitorship of the International Union, United Automobile, Aerospace, and Agricultural Implement Workers of America (the "Union" or the "UAW"). This Sixth Report Addendum is being filed in order to correct certain errors, immaterial to the outcome of any race in the Run-Off Election, contained in certain exhibits to the Monitor's Sixth Status Report ("Sixth Report").¹ Those errors were identified after the Sixth Report was filed with the Court.

Specifically, the Sixth Report reported the total number of votes counted in all races during the Run-Off Election—which occurred at three different times: (1) March 1-4, 2023; (2) March 16, 2023; and (3) March 25, 2023²—and the following errors are being corrected in the exhibits attached to this Addendum:

- Exhibit A to the Sixth Report included a table reporting the results of the March 1-4, 2023, vote count.³ That exhibit inadvertently misreported the total count for Ray Curry as 69,118, rather than 68,473,⁴ and inadvertently omitted Chuck Browning's name from the table.⁵ Those errors have been corrected in Exhibit A-1 to this Addendum.
- Exhibit D to the Sixth Report reported the cumulative number of votes counted during the March 1-4, 2023, March 16, 2023, and March 25, 2023,

¹ Monitor's Sixth Status Report, *USA v. Int'l Union, United Auto., Aerospace & Agric. Implement Workers of Am.* (March 25, 2023), Civil No. 20-cv-13293, ECF No. 102.

² The Sixth Report announced the unofficial results of the race for International President, while the Fifth Report, filed after the March 16, 2023, vote count, announced the unofficial results of the races for International Vice President and Region 9 Director. *See* Monitor's Fifth Status Report, *USA v. Int'l Union, United Auto., Aerospace & Agric. Implement Workers of Am.* (March 17, 2023), Civil No. 20-cv-13293, ECF No. 101 ("Fifth Report"). The race for International President remained pending at the time the Fifth Report was filed. *See id.*

³ Sixth Report, ECF No. 102-2 (Exhibit A).

⁴ The number of votes for Ray Curry from the March 1-4, 2023, vote count was accurately reported in Exhibit A to the Monitor's Fifth Status Report, which also reported the results of the March 1-4, 2023, vote count. *See* Fifth Report, ECF No. 101-1 (Exhibit A). In addition, the number of votes for Ray Curry was accurately reflected in Exhibit D to the Sixth Report, which reported the cumulative vote totals from the Run-Off Election vote counts. *See* Sixth Report, ECF No. 102-5 (Exhibit D).

⁵ Sixth Report, ECF No. 102-2 (Exhibit A).

vote counts. In that exhibit, the number of votes from Region 6/AL (At-Large) and the total number of votes for Tim Bressler were inadvertently misreported as 874 and 46,180, rather than 1,131 and 46,437.⁶ That error has been corrected in Exhibit D-1.

The attached Exhibits A-1, B-1, C-1, and D-1 are intended to supersede and replace Exhibits A, B, C, and D to the Sixth Report.⁷ Except for the changes noted above, the exhibits are otherwise the same.

Date: May 2, 2023



Neil M. Barofsky, Monitor

*Respectfully filed with the Court on behalf
of the Monitor by counsel to the Monitor,*

/s/ Michael W. Ross

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⁶ Sixth Report, ECF No. 102-5 (Exhibit D).

⁷ Exhibits B-1 and C-1 are attached to this Addendum merely for completeness, because no errors were identified in Exhibits B and C to the Sixth Report.

CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2023, the foregoing Addendum to the Monitor's Sixth Status Report was served electronically on all counsel of record via the CM/ECF system. In addition, pursuant to Paragraph 58 of the Consent Decree, the foregoing Addendum to the Monitor's Sixth Status Report was served on consent by electronic mail upon the United States, the UAW's International President, the International Executive Board, and designated counsel for UAW.

/s/ Michael W. Ross
Michael W. Ross